

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WILLIAM HANSON, III,

Plaintiff,

v.

LOWE'S HOME CENTERS, INC., et al.

Defendants.

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C.A. No.: 05-0046 (JJF)

TRIAL BY JURY DEMANDED

NOTICE OF DEPOSITION

TO: Peter M. Sweeney, Esq.
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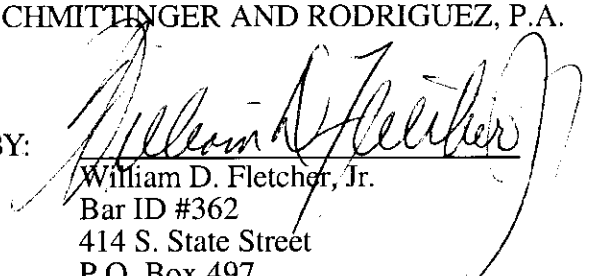
PLEASE TAKE NOTICE that the deposition of the Defendant Corporation, Lowe's Home Centers, Inc. ("Lowe's"), pursuant to Federal Civil Rule of Procedure 30(b)(6) will be taken at 9:00 a.m. on Monday August 1, 2005 at the offices of Schmittinger and Rodriguez, P.A., 414 South State Street, Dover, DE 19901. Defendant Corporation shall produce one or more persons who consent to testify on behalf of Defendant Lowe's as to all matters known or reasonably available to Defendant Lowe's regarding the content of each of the following items, which said items shall be brought to the deposition(s) for questioning of the deponent(s):

1. Any and all communications, including correspondence, internal memoranda and e-mails, between or among Defendants, any other party, or any of Defendants' agents regarding Plaintiff;
2. The personnel files of Yvette Schriver and Linda Meyers, and any other records held by Defendant Lowe's concerning these people, including disciplinary notices;

3. Lowe's Equal Opportunity Policy;
4. Lowe's policies relating to the prohibition of recording equipment use;
5. Customer Case incident fax, dated 12/3/03;
6. Audio tape of conversation recorded by Plaintiff;
7. Merchandiser Service Agreement between Ideal Merchandising Sales and Services, Inc. and Lowe's, dated 11/20/01;
8. Any documentation of workplace conduct, rules or regulations that Defendant Lowe's contends applies to Plaintiff;
9. Any other documentation relating to workplace conduct, rules or regulations for employees and others conducting business with Defendant Lowe's on its premises.

SCHMITTINGER AND RODRIGUEZ, P.A.

BY:


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Attorneys for Plaintiffs

Dated: 7/25/05
WDF:tel

cc: Cheryl Anthony